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Filing date: **02/08/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|------------------------|---|
| Proceeding | 91219154 |
| Party | Plaintiff Unum Group |
| Correspondence Address | MICHELLE ALVEY HUSCH BLACKWELL LLP 190 CARONDELET PLAZA, STE 600 ST LOUIS, MO 63105 UNITED STATES pto-sl@huschblackwell.com, Michelle.Alvey@huschblackwell.com, Arkadia.Olson@huschblackwell.com, Nicole.Anderson@huschblackwell.com |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Michelle Alvey |
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| Signature | /Michelle Alvey/ |
| Date | 02/08/2016 |
| Attachments | Consent_Motion_Ext_and_Status.pdf(96167 bytes) |

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being filed with the United States Patent and Trademark Office via the Electronic System for Trademark Trials and Appeals on February 8, 2016.

/Michelle Alvey/

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Application
Serial Nos. 85631001 and 85630997

| | | |
|-------------------|---|-------------------------|
| UNUM GROUP, |) | |
| |) | |
| Opposer, |) | |
| |) | |
| v. |) | Opposition No. 91219154 |
| |) | |
| HIBU (UK) LIMITED |) | |
| |) | |
| |) | |
| Applicant. |) | |

**CONSENT MOTION FOR AN EXTENSION OF DISCOVERY AND TRIAL DATES IN
ORDER TO FINALIZE SIGNATURE AND STATUS REPORT**

Opposer Unum Group (“Opposer”) with the consent of Applicant Hibu (UK) Limited (“Applicant”) hereby submits the following motion for an extension of discovery and trial dates and status report:

1. On November 4, 2015 the parties filed a stipulated motion to extend discovery and trial dates.
2. On November 6, 2015, the Board granted the motion to extend, but required that any future requests for extensions must include a report on the progress of their settlement talks to establish good cause for any continued suspension or extension requests.

3. Since that date, the parties have negotiated a resolution of the dispute in its entirety, approved the written Settlement Agreement, and the parties simply require additional time to obtain signatures from all parties.

4. In consideration of the information provided herein, Applicant and Opposer respectfully submit that there is good cause for an extension and respectfully request that this matter be extended 30 days and the discovery and trial dates be reset as follows in order to allow the parties time to obtain signatures from all parties:

| | |
|---|--------------------|
| Initial Disclosures | March 7, 2016 |
| Expert Disclosures | July 5, 2016 |
| Discovery Closes | August 4, 2016 |
| Plaintiff's Pretrial Disclosures | September 18, 2016 |
| Plaintiff 30-day trial Period Ends | November 2, 2016 |
| Defendant's Pretrial Disclosures | November 17, 2016 |
| Defendant's 30-day trial Period Ends | January 1, 2017 |
| Plaintiff's Rebuttal Disclosures | January 16, 2017 |
| Plaintiff's 15-day Rebuttal Period Ends | February 15, 2017 |

5. Counsel for both parties have consented to this request and the parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

Respectfully submitted,

By: /Michelle Alvey/
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Attorneys for Opposer.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been duly served on the Applicant by mailing a copy of same via U.S. Mail, postage prepaid, on this 8th day of February, 2016 to:

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/Michelle Alvey/